

CESA BC Extended Producer Responsibility Plan

June 22, 2018

SUBMITTED TO:

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Executive Summary

The CESA BC Extended Producer Responsibility Plan (“Program Plan”) for electrical small appliances and power tools, sewing machines, exercise, sports and leisure equipment, and art, craft and hobby devices has been prepared pursuant to the requirements of the BC Recycling Regulation B.C. Reg. 449/2004 (O.C. 995/2004) (“Regulation”). This plan replaces the CESA BC Product Stewardship Plan – Part 1: Phase 4 Products, and Part 2: Phase 5 Products dated August 17, 2011 and March 9, 2012 respectively.

The Canadian Electrical Stewardship Association (“CESA”) assists its members in providing end-of-life product management by handling products in adherence of the order of the pollution prevention hierarchy. After seven¹ years of operation, the Program has seen many accomplishments. CESA has established a robust collection system, which provides access to over 99% of British Columbians, and has achieved a consumer awareness level of 79% as of 2016. The Program has also continued to increase absolute collection weight year over year.

This Program Plan addresses the following:

- Management of program costs, environmental risk reduction and dispute resolution.
- Public awareness of the Program, collection system and proper handling of Program Products.
- Measurement of Program performance through a number of key metrics including absolute collection, waste composition audits, accessibility and consumer awareness.

In addition, the Program Plan puts forth performance metrics for five years through to June 22, 2023 after which time a re-evaluation of metrics will be conducted, if warranted.

¹ Metrics included in this Plan have been revised from the previous submissions (September 30, 2016 and December 8, 2017) to reflect the latest program metrics.

Glossary of Terms and Abbreviations

AHAM	Association of Home Appliance Manufacturers
CESA	Canadian Electrical Stewardship Association
CHHMA	Canadian Hardware and Houseware Manufacturers Association
CWMA	Coast Waste Management Association
EHF	Environmental Handling Fee
EPR	Extended Producer Responsibility
EPRA	Electronic Products Recycling Association
EPSC	Electronics Product Stewardship Canada
ERS	Environmental Recycling Standard
ICI	Industrial, Commercial & Institutional
PPH	Pollution Prevention Hierarchy
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
SABC	Stewardship Agencies of B.C.

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1. Introduction

The revised CESA BC Extended Producer Responsibility Plan (“Program Plan”) is submitted by the Canadian Electrical Stewardship Association (“CESA”) to the British Columbia Ministry of Environment, pursuant to the requirements of the BC Recycling Regulation (“Regulation”).² The Program Plan replaces the CESA BC Product Stewardship Plan – Part 1: Phase 4 Products and Part 2: Phase 5 Products dated August 17, 2011 and March 9, 2012 respectively.

CESA has achieved numerous accomplishments over the past seven years of operation. The Program has established a free collection system for consumers providing access to over 99% of British Columbians, and has achieved a consumer awareness level of 79%. The Program has also continued to increase absolute collection weight year over year.

2. Duty of Producer

Section 2.1 of the Regulation provides:

Except as otherwise specifically provided in this regulation, a producer must

(a) have an approved plan under Part 2 [Product Stewardship Plans] and comply with the approved plan, or

(b) comply with Part 3 [Product Stewardship Program Requirements If No Product Stewardship Plan]

with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia.

The Regulation defines “Producer” as:

(b) in respect of the producer of a product within a product category other than the beverage container product category or the tire product category,

(i) a person who manufactures the product and sells, offers for sale, distributes or uses in a commercial enterprise the product in British Columbia under the manufacturer's own brand,

(ii) if subparagraph (i) does not apply, a person who is not the manufacturer of the product but is the owner or licensee of a trademark under which a product is sold, distributed or used in a commercial enterprise in British Columbia, whether or not the trademark is registered, or

(iii) if subparagraphs (i) and (ii) do not apply, a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise;

² British Columbia Ministry of Environment, BC Recycling Regulation, B.C. Reg. 449/2004 (O.C. 995/2004). Accessed at http://www.bclaws.ca/civix/document/id/complete/statreg/449_2004

The BC Recycling Regulation Guide further details the definition of a producer as an “importer, broker or retailer who sells the product directly to a consumer or imports and uses the product in a commercial enterprise and includes catalogue or Internet transactions.”³

3. Appointment of Stewardship Agency

CESA is a national not-for-profit organization of manufacturers, brand owners and retailers of electrical small appliances and power tools, sewing machines, sport and leisure equipment, and arts, craft and hobby devices (“Program Products”) created to assist its members to provide end-of-life product management by handling products in adherence of the order of the pollution prevention hierarchy. CESA utilizes an extensive recruitment policy to ensure that the majority of producers are covered under the CESA BC Extended Producer Responsibility Plan, recognizing that achieving 100 per cent of producers may not be attainable as the market is never static.

CESA is incorporated under the Canada Not-for-Profit Corporations Act and is governed by a Board of Directors. The Board is structured with the intent of having representation of both manufacturers and retailers from as many product categories as possible. A current list of CESA’s Board of Directors responsible for the oversight of the Program is available on CESA’s website (www.electrorecycle.ca). Any changes to CESA’s governance structure will be reflected in the annual report. Additionally, CESA works with manufacturer and retailer associations including the Canadian Hardware and Housewares Manufacturers Association (CHHMA), the Association of Home Appliance Manufacturers (AHAM Canada) and the Retail Council of Canada (RCC).

Currently, CESA operates one program in Canada: ElectroRecycle™, British Columbia’s small appliance and power tool recycling solution (“Program”). The approval of the CESA BC Extended Producer Responsibility Plan assures that the agency will perform the required duties on behalf of each producer that has joined the agency. CESA members represent the vast majority of the small appliance and power tool market in British Columbia for obligated products. Program membership is open to all obligated Producers, and registered members may include the manufacturers, brand owners, distributors, first importers and retailers of obligated products that are directly sold within or sold into BC.

Each of the Program’s members appoint CESA as their stewardship agency as described in section 2(2) of the Regulation. A current list of CESA members is available at <http://www.electrorecycle.ca/stewards/overview/list-of-cesa-members/>.

4. Products Covered Under the Extended Producer Responsibility Plan

The Program includes portable electrical appliances, power tools, sewing machines, sport and leisure equipment, and arts, craft and hobby devices as defined under Section 2(1) of Schedule 3 in the Regulation.

³ British Columbia Ministry of Environment, *Recycling Regulation Guide* (April 2012). Accessed at <http://www.electrorecycle.ca/wp-content/uploads/2015/04/BC-recycling-regulatoin-guide-2012.pdf>

4.1 Inclusion/Exclusion of Products

The decision to include or exclude a product in the Program involves the consideration of a variety of product attributes, including but not limited to the features listed below. An internal decision tree is used to guide product decisions in addition to input received from CESA's Producer Relations Committee, which is comprised of several small appliance manufacturers and retailers.

Power Source

Products that are powered by 120V, 12V, 60Hz or batteries are included in the Program. Products that do not require electrical power, or products that derive their power from alternative power sources such as USB or solar powered devices, are excluded from the Program.

Electronic Display

A product whose sole electrical requirement is for an electronic display is excluded from the Program. If an electronic display is not integral to the function of the product, such as a manual exercise machine whose only electrical component is an electronic display, the product is excluded. For example, a manual rowing machine does not require electricity to serve its primary function. The only electrical source for this product is required to power an LCD screen that displays speed and calories burned; the LCD screen does not contribute to the primary function of the product. The rowing machine can still be used for its intended purpose without the electronic display.

Product Design

Products designed for household use are included in the Program. Product designed for industrial or commercial purposes are excluded from the Program.

Portability

Portable small appliances and power tools are included in the Program. CESA defines portability as a product in which the intended use suggests that the product can be easily moved for use in multiple rooms and/or locations. Products which are hard-wired in, plumbed or mounted are excluded from the Program.

Orphaned Products

Accepted products include orphaned products. This includes items that are no longer in production or which the manufacturer is no longer producing, provided that their function was the same as Program Products.

Accessories

Any accessories intended for use with Program Products are included in the Program.

Batteries

The Program manages all components of regulated Program Products including primary and rechargeable batteries that are embedded and not easily removed, as well as rechargeable batteries

intended for use with Program Products. The Program's primary processors remove the batteries from Program Products and send them to an approved downstream processor where base materials are extracted and commodified at the Program's expense.

4.2 Product Categories

In 2015 a product category evaluation was undertaken and for ease of reporting for the Program's members, a decision was made to amalgamate several product categories. This change was implemented on July 1, 2015. CESA commits to further evaluation over time to ensure the Program continues to report the best data available while not increasing the reporting burden for its members. Program Products are organized into 18 categories with examples of accepted and excluded products listed in Table 1.

Table 1: CESA Product Categories

Product Category	Category Definition	Examples of Accepted Products	Examples of Excluded Products
1. Kitchen Countertop – Motorized Appliances	Electrical portable appliances for food preparation that may include heating elements or motors	<ul style="list-style-type: none"> • Blender • Electric knife • Stand mixer 	<ul style="list-style-type: none"> • Large appliances such as refrigerators, countertop dishwashers and built in water filtration systems
2. Kitchen Countertop – Heating Appliances		<ul style="list-style-type: none"> • Bread maker • Deep fryer • Toaster 	
3. Kitchen Countertop – Heating Appliances (Coffee/Tea)		<ul style="list-style-type: none"> • Drip and pod coffee makers • Electric kettle • Percolators 	
4. Microwave Ovens	Countertop microwave ovens only	<ul style="list-style-type: none"> • Countertop microwave ovens 	<ul style="list-style-type: none"> • Built-in or Over the Range microwaves
5. Time Measurement & Display Devices	Electrical portable appliances used for measuring or displaying time	<ul style="list-style-type: none"> • Alarm clock • Wall clock • Timer 	<ul style="list-style-type: none"> • Wind-up clocks • Grandfather clocks
6. Weight Measurement	Electrical portable appliances used for measuring weight	<ul style="list-style-type: none"> • Bathroom scale • Countertop food scale • Digital luggage scale 	<ul style="list-style-type: none"> • Doctor's scales • Laboratory scales
7. Garment Care Appliances	Electrical appliances for smoothing wrinkles from fabrics or for garment care	<ul style="list-style-type: none"> • Irons (cordless, residential, travel) • Clothes shaver • Garment steamer 	<ul style="list-style-type: none"> • Industrial or commercial ironing appliances
8. Air Treatment Appliances	Electrical portable appliances used for space conditioning	<ul style="list-style-type: none"> • Air fresheners/scent diffusers • Fans (desktop and portable) • Portable heaters 	<ul style="list-style-type: none"> • Large air treatment appliances such as furnaces and exhaust ventilation equipment

Product Category	Category Definition	Examples of Accepted Products	Examples of Excluded Products
9. Personal Care Appliances	Electrical portable appliances used for personal grooming or hygiene	<ul style="list-style-type: none"> • Hair Straightener • Hair dryer • Massagers 	<ul style="list-style-type: none"> • Medical monitors • Breast pumps
10. Full-size Floor Cleaning Appliances	Electrical portable appliances and their accessories used for dry or wet cleaning of floor and upholstery surfaces	<ul style="list-style-type: none"> • Floor steamer • Vacuums (robotic, upright, canister and wet-dry vacuums) 	<ul style="list-style-type: none"> • Ride-on vacuums used in industrial or commercial centres • Central vacuum cleaner systems built into a home structure
11. Smaller Floor/Surface Cleaning Appliances		<ul style="list-style-type: none"> • Automotive vacuum cleaner (12V) • Brooms or sweepers • Stick vacuum cleaners 	
12. Test and Measurement Tools	Portable electronic or electrical tools used for monitoring, measuring, weighing and adjusting	<ul style="list-style-type: none"> • Meters (clamp meter, fork meter, moisture meter etc.) • Thermometer (cooking, non-contact infrared) • Socket tester 	<ul style="list-style-type: none"> • Tools driven by gas or compressed air/liquid, e.g. air compressors • Non-powered hand tools (e.g. hammer, wrench etc.) that do not require electrical or battery power
13. Hand-Held Power Tools (Corded and Cordless)	Portable/mobile electronic or electrical tools with a power cord and/or battery(ies). Program Products include, but are not limited to, those used for bending, cutting, drilling, folding, grinding, milling, polishing, punching, sanding, sawing, shearing, soldering, turning, welding or otherwise processing wood, metals or other materials. Program Products also include those used for nailing, riveting, screwing or removing nails, rivets or screws.	<ul style="list-style-type: none"> • Drill • Grinder • Jigsaw • Sander • Waxer 	
14. Bench-Top, Demolition and Free-Standing Power Tools		<ul style="list-style-type: none"> • Drill press • Demolition Hammer • Pipe Thawer • Table saw 	
15. Sewing/Textile Machines	Portable/mobile electronic or electrical appliances and machines with a power cord, plus and/or battery(ies) used for embroidering, knitting,	<ul style="list-style-type: none"> • Quilting machine • Sewing machine • Serger 	<ul style="list-style-type: none"> • Large stationary machines which are not designed to be moved

Product Category	Category Definition	Examples of Accepted Products	Examples of Excluded Products
	sewing, weaving or otherwise processing textiles		
16. Exercise Machines	Exercise machines that use any kind of power mechanism (plug, cord or battery) to power the product and/or to assist in adjusting the resistance mechanism in the product	<ul style="list-style-type: none"> • Cycling machine • Elliptical machine • Treadmill 	<ul style="list-style-type: none"> • Machines that do not require electricity for the primary function (e.g. step machine, rowing machine etc.)
17. Sports, Leisure, Arts, Craft & Hobby Devices	Portable/mobile electronic or electrical equipment or devices used primarily for sport and/or leisure with a power cord, plug of battery(ies) and a primary purpose that requires electricity and/or battery power	<ul style="list-style-type: none"> • Airbrush equipment (makeup, cake decorating etc.) • Rock polisher • Telescope 	<ul style="list-style-type: none"> • Tattoo equipment • 4 wheelers/quads • Drones
18. Designated Very Small Items	Products having an average weight significantly lower than the products included in CESA's other categories. Though exempt from their natural categories, such products are not exempt from the CESA program	<ul style="list-style-type: none"> • Electric toothbrush • Glue gun • Personal fan 	<ul style="list-style-type: none"> • Only items specifically categorized as DVS by the Program are included in Category 18. All other products are excluded.

The product categories as defined by CESA are subject to change at CESA's discretion. Future products that fit within the above categories will be considered for inclusion in the Program. Members are made aware of any product decisions and/or changes to product categories through regular notices and updates to product lists on the website.

The most current list of product inclusions and exclusions is available online:

<http://www.electrorecycle.ca/recycle/>.

5. Stakeholder Consultation

Stakeholder consultations⁴ were implemented to provide meaningful opportunities for public consultation and comment. The consultations included:

- Email communication to all interested stakeholders including, but not limited to, industry members, industry associations, service providers, non-profit organizations, First Nations, and

⁴ Guidance for Stewardship Plan Consultation proceedings was provided following the completion of CESA's consultation process. As such, CESA has provided as much detail as possible regarding stakeholder participation.

regional and local governments. Notice of consultation was also posted on the Program's website and distributed through industry associations and non-profit organizations, including the Recycling Council of BC (RCBC), Stewardship Agencies of BC (SABC), and Coast Waste Management Association (CWMA)

- Posting the draft plan renewal on the Program's website for public review one month prior to the start of public consultations
- An in-person consultation meeting held at the RCBC Conference in Whistler, BC on May 18, 2016
- A web-based conference call held for the BC Product Stewardship Council on June 10, 2016
- A web-based conference call for all interested stakeholders on August 24, 2016
- Written comments from stakeholders were accepted until September 9, 2016

Fifty two stakeholders participated, representing organizations from provincial and local governments, recycling organizations, retailers, processors, transporters, environmental groups and other BC stewardship programs. The responses to questions and feedback received are found in Appendix A.

The Program Plan was originally submitted on September 30th, 2016. CESA revised and resubmitted Program Plan on December 8th, 2017 based on feedback that was received directly by the Ministry of Environment following CESA's consultation period in 2016.

The Program offers stakeholders a number of means of providing ongoing feedback about the operation of the Program:

- Advisory committee meetings, including a Producer Relations Committee
- Annual General Meeting
- Member updates and notices
- Collection facility updates and notices
- SABC coordinated events including roundtables with key stakeholders (Regional districts, collection facility operators)
- Webinars held in partnership with SABC and the BC Product Stewardship Council
- Face to face meetings with stakeholders at annual conferences, including RCBC and CWMA
- Public feedback during public outreach and collection events
- Stakeholder feedback received by phone (1-877-670-2372) and email (info@cesarecycling.ca)

6. Collection System and Consumer Accessibility

In accordance with Section 5(1)(c)(iii) of the Regulation, CESA employs a system of permanent year-round collection facilities located across British Columbia to provide access to recycle Program Products at no cost to consumers. This collection system has been developed in collaboration with other stewardship programs to enhance Program performance through increased operational efficiencies. This also assists in reducing consumer confusion by providing consumers with a one-stop-shop for designated products where they can recycle multiple products at one location. Where feasible, CESA will continue to manage the collection network with a focus on stewardship collaboration in the future.

CESA does not directly own or manage any collection facilities, but contracts with organizations that can provide a collection location. Collection facilities include any location that accepts Program Products, including but not limited to private drop-off centres, local government sites, service organizations and return-to-retail. Regardless of the type of collection facility, there is no charge to the consumer to drop-off Program Products.

6.1 Collection Site Types

CESA defines two streams of products included in the Program when sourcing collection facilities: “regular” and “very large items”. Products that are considered very large items include products such as treadmills, elliptical trainers, and large, freestanding power tools with built-in stands. All other products are considered regular items.

To encourage the collection of very large items, CESA provides a financial incentive to facilities that have the capacity to handle these items. However, due to the nature of very large items the Program is challenged with managing these products for several reasons:

- Very large items collected through the Program comprise a small amount of the total weight of CESA product collected.
- Very large items are expensive, more robust products with longer lifespans that tend to be reused and resold as opposed to recycled.
- Very large items brought in for recycling are managed independently of the Program as scrap metal and collection sites retain any revenue from the sale of these items. Given the intrinsic value of very large items, collectors have a financial incentive to recycle these products so that they are not disposed of through alternative streams.

As of December 31, 2017, the Program had 215 contracted collection facilities for Program Products, of which 210 accepted regular items and 76 accepted very large items. The majority of very large item collection facilities overlap with regular product collection facilities. The Program’s website provides the consumer with access to a depot finder that indicates if a collection site will accept regular and/or very large items.

Of the 215 contracted collection facilities, 198 were advertised sites, while 17 were unadvertised sites. Advertised collection facilities accept public drop-off of Program Products. Unadvertised sites, which include large volume generators who may operate in the commercial or institutional (ICI) sector, municipal facilities and landfills, do not allow public drop-off and are not listed as a facility on the ElectroRecycle website or through RCBC’s consumer hotline. However, the Program offers direct pick-up of designated CESA products as a part of the unadvertised service. Many thrift stores are also unadvertised due to limited space available to collect Program Products.

CESA augments the collection system by participating in one-day collection events. These events are organized through CESA’s Ambassador Program, which is tasked with increasing the Program’s reach beyond its permanent collection sites across BC. The success of these collection events is increased

through collaboration with a variety of community partners including retailers, regional districts, municipalities and First Nations communities, as well as other stewardship agencies. Since the inception of the Ambassador Program, CESA has participated in more than 425 community events across the province. In 2017 alone, the Ambassador Program participated in 118 collection events throughout BC. The Program will continue to evaluate the success of the Ambassador Program and will consider alternative collection possibilities as they develop. This may include expanding the collection system into rural areas and underserved demographics, specifically pursuing collaboration with First Nations communities. CESA will also pursue partnerships with retail locations to establish return-to-retail collection facilities in the province.

Collection System Reporting Metrics

The Program's annual report includes several indicators that demonstrate the effectiveness of its collection efforts, including the location and number of collection sites for both regular and very large items, and identifies any changes in the collection network compared to the previous year. Additionally, the Program reports annually on the number of collection sites by regional district as well as the number of collection events by regional district.

6.2 Accessibility

The Program measures consumer access to collection facilities in accordance with the Accessibility Standard established by the Stewardship Agencies of BC (SABC). SABC is an informal organization through which provincial stewardship programs work together on common issues of interest. The Accessibility Standard was put forward to assist in defining the "Reasonable Access" requirements under the Recycling Regulation for communities of varying sizes. SABC's Standard defines reasonable access as a 30-minute drive to a collection site in urban areas of a population greater than 4,000, and a 45-minute drive to a collection site in rural areas with a population greater than 4,000.

For the purposes of this Standard, rural communities are defined as cities, towns, resort municipalities and district municipalities with a population of between 4,000 and 29,999 outside the Metro Vancouver and Capital Regional Districts. Urban communities are defined as cities, district municipalities and towns within the Metro Vancouver and Capital Regional Districts with a population of 4,000 or more and cities and district municipalities with a population of 30,000 or more in the remainder of the province.

The Statistics Canada definition of urban and rural population size has changed since SABC originally developed this Standard, however CESA maintains that the Standard is still applicable. CESA services the majority of communities that are defined by the Standard as rural with a population of greater than 4,000. Residents of communities where the population is less than the minimum requirement for the Standard to apply must also visit larger commercial centres for other basic needs such as food, fuel, and clothing. Therefore, it is reasonable to expect that the recycling of designated products can be done in the centre where the residents undertake other commercial activities.

Recognizing that it is not possible to have depot coverage in all of the remote and rural areas of the province, the Standard was established to ensure reasonable access to collection facilities for a high percentage of the province's population. Remote areas in the province can pose challenges for accessibility due to their isolated locations, therefore permanent collection facilities may not exist in all remote areas of BC. The Program collaborates with community partners and in some cases other stewardship agencies, to host collection events in areas where a permanent collection site is not available. See section 6.1 for additional information on collection events.

A professional consulting firm utilizing commonly accepted GIS practices conducted a GIS analysis for the Program in 2015. The analysis found that 99.5% of British Columbians had access to a collection site for regular products. Since this analysis was completed, the collection network has gradually expanded into new communities of BC increasing the Program's accessibility for British Columbians. Results of the 2015 analysis are found in Table 2.

Table 2: 2015 CESA Accessibility Analysis

SABC Accessibility	Urban Population with Access; and % of Urban Population	Rural Population with Access; and % of Rural Population	Total SABC Population with Access; and % of SABC Population	Total BC Population with Access; and % of Total Population
Total Population	3,374,825	619,424	3,994,249	4,398,961
Regular CESA Products	3,373,479 99.96%	599,775 96.83%	3,973,254 99.47%	4,284,501 97.40%
Very Large CESA Products	3,325,909 98.55%	415,664 67.10%	3,741,573 93.67%	3,932,624 89.40%

After seven years of operation, the Program recognizes the challenge of managing very large items and does not intend to report on accessibility for very large item collection sites. The Program encourages potential collection sites to consider participating in the very large item collection program when applying to participate in the Program, however due to infrastructure and space requirements, establishing a permanent collection site for bulky items is not an option for many communities. If this is the case, the Program will consider hosting a collection event individually or examine the possibility of participating in a collection event with other parties, such as municipalities, regional districts, retailers or other stewardship programs.

Accessibility Reporting Metrics

The collection system has remained stable over the past several years and CESA continues to seek opportunities for expansion where feasible. Going forward, the Program will strive to maintain the accessibility rate of 99.5% for regular products and will continue to monitor its collection system. After five years, the Program will reevaluate its collection system to ensure that accessibility rates have not

materially changed over the duration of this Program Plan. For each year that an accessibility study is conducted, the Program will report out on the survey techniques and results in the annual report.

6.3 Absolute Collection

Absolute collection for CESA reflects the weight of Program Products collected annually by the Program across BC. The Program measures collections by weight (kg), not units collected. The Program has recorded a 15% increase in total weight collected year-over-year between 2013-2015, a 7.5% increase in total weight collected between 2015-2016, and an 8% increase in total weight collected between 2016-2017. Although the variance in collection weight has experienced an increase since 2013, the drop in year-over-year collection weight indicates that the rate of increase in collections may not be sustained through the next term for the following reasons:

- The material composition of small appliances continues to move towards use of lighter weight commodities (e.g., plastics), so an increase of product collected may not result in similar increases in weight collected.
- Product life expectancy is based on hours of use, which is often determined by the motors within the appliances and power tools. As a result, the number of years a product lasts may vary greatly based on the level of use.
- The number of small appliances and power tools found in an average household is limited when compared to other electronic products. For example, the average household will have just one electrical appliance (e.g. a coffee maker) whereas a household may have multiple electronic products (e.g. a laptop or television).
- Accessibility and consumer awareness levels are currently very high. Any future growth will be relatively modest compared to the early rapid expansion of the Program's collection network and similar increase in consumer awareness.

Other maturing stewardship programs show similar trends as the rate of increase in collection weights plateau.

Absolute Collection Reporting Metrics

The Program's annual report includes the weight of regular product collected as well as the weight collected by regional district. In addition, the Program will report annually on the product collected per capita⁵ by regional district. Very large items are reported as total units collected according to the monthly unit-based tracking forms submitted by contracted very large item collection sites.

6.4 Recovery Rate

While a recovery rate⁶ is a useful metric for many stewardship programs, CESA cannot use recovery rate as a performance metric for the following reasons:

⁵ CESA recognizes that product collected per capita by regional district is not a reliable metric for comparison due to a variety of factors including population variance, consumer buying habits and varying levels of product use by individuals across the province.

⁶ Recovery rate is the amount of material collected divided by the amount of material sold in the same year.

- The relationship between the weight of Program Product purchased and available to collect is not linear. The life expectancy of products is based on hours of use that is often determined by the motors within the appliances and power tools. As a result, the number of years that a product lasts may vary greatly based on its level of use.
- The quantity of product sold is determined from sales reports submitted by members in units, whereas product collected is reported by weight (kg). There is no standard conversion factor for units to weight for product categories due to the variety and breadth of products collected within the CESA's 18 product categories.
- Collecting unit data on Program Products is cost prohibitive. The required effort to achieve this level of data collection is not feasible due to the number and variance of Program Products. Currently, the Program accepts more than 350 products that range in size from a microwave to an electric toothbrush.

6.5 Waste Composition Audits

Waste audits are a valuable statistic to measure the Program's success. In conjunction with other stewardship agencies, the Program has participated in six waste audits to date in communities which range in size from 30 thousand to more than 2.5 million people. Each audit surveys a sample of waste from a landfill and tracks evidence of product categories. The audits confirm that Program Products are being successfully diverted from landfill while also helping to guide the CESA's awareness campaigns.

Product categories identified as a concern are evidenced through waste audit findings, and help to determine where the Program may need to focus its efforts from a promotional and campaign perspective. However due to the varying longevity of Program Products, the impact of awareness campaigns undertaken by the Program to increase awareness of lesser-known product categories may not be immediately apparent, but will manifest over time. The Program will continue to participate in waste audits undertaken by regional districts in partnership with SABC and use the results as an indicator of the Program's functionality, as well as a guide for future awareness campaigns.

Waste Audit Reporting Metrics

It is important to note that while the data obtained from waste audits provides one way of evaluating the Program's performance in that specific community, extrapolating the results to the entire province is problematic as variations in collection and waste management practices vary across regional districts. CESA will report annually on an aggregate of waste audits conducted over multiple years that the Program has participated in partnership with SABC, which contribute to driving consumer awareness efforts. In addition, CESA will report on the total amount of aggregate batteries⁷ identified during each waste audit that CESA participates in.

⁷ The identification of batteries through waste audits does not distinguish the stewardship program responsible for the battery when originally sold into the market.

7. Consumer Awareness

7.1 Consumer Education and Awareness

Section 5(1)(iv) requires that a stewardship plan make adequate provision for informing consumers on the Program including the location of facilities and proper management of Program Products.

Accordingly, the Program provides information on the stewardship program through the website and other program collateral that address:

- Return options, including permanent collection facilities and event opportunities
- Product categories of examples of products accepted in the Program
- Proper handling procedures for Program Products, including accessories and batteries intended for use with Program Products
- Applicable fees and how they are used by the Program

Wherever possible, the Program works with other stewardship agencies to provide coordinated program information and access to consumers. This includes collaboration with RCBC to provide a single point of consumer information through a hotline, website and Recyclepedia smartphone app, as well as a joint product guide with other stewardship programs through SABC.

Communication Objectives

The Program's communications objectives are to:

- a) Maintain the Program's consumer awareness level of 79%.
- b) Ensure an extensive geographical reach in the province by using an array of media platforms to speak to the Program's various audiences.
- c) Engage stakeholders to collaborate with and support the Program proactively with available resources (i.e. collection events, point of sale/point of return materials).
- d) Build on CESA's extensive network of third party organizations and institutions and leverage existing partnerships to maximize communications reach and market penetration.

Target Audiences

The Program is focused on reaching the following target audiences:

- a) Consumers: The Program's end user, driver of collection weight, and principal message recipient.
- b) Service Partners: The Program's front line and direct face, facilitators of responsible behaviour. Includes collection site operators, retailers, transporters and processors.
- c) First Nations and Remote Communities: British Columbians with historically lower-than-average program use.
- d) News Media: Wide-reaching communications seeking stories that will resonate with the largest possible audience.

Communications Strategy, Tools and Methods

The Program utilizes a robust communications strategy for British Columbia in order to continue to maintain existing program awareness levels and encourage consumer participation throughout the

province. The strategy is informed by a number of key insights revealed through regional, provincial and national research⁸, CESA findings from engagement with communities around the province, and learnings taken from the administration of the Program since inception.

CESA will continue to employ industry best practices in the promotion of the Program, adjusting its specific mix of media channels, partners and suppliers on the basis of ongoing performance analysis. The following describes the tools/methods CESA may employ in service of program growth:

- **Stakeholder Communications**

CESA will deploy regular newsletters to relevant stakeholders to advise of developments in the Program, in-market initiatives, insight mining (opinion polling, requests for comment, etc.).

- **Point of Sale (PoS) & Point of Return (PoR) Materials**

Rack cards, semi-permanent signage, event posters, branded prize materials, etc. are given out at retail stores, collection depots, trade shows and through community events.

- **Website**

CESA operates a dedicated program website (www.electrorecycle.ca) with relevant information for all audiences with whom it engages. Information includes, but is not limited to:

- Collection site locations (supplied via a location-based finder tool) with details on hours of operation and products accepted
- Details on upcoming collection events
- Proper handling and management of Program Products and accessories
- Detailed description of products accepted by the Program
- Details on environmental handling fees associated with the Program
- Contact information for those with questions
- Annual reports and other program information
- FAQs related to the Program
- Relevant news and updates, including a blog section
- Links to Program social channels

- **Events and Ambassador Program**

The Program has employed an ambassador team to travel to key regions in the province. Program ambassadors engage directly with various stakeholder audiences in order to raise program awareness and elicit constructive program feedback. Ongoing event/ambassador team activities may include participation in relevant third-party community events, remote community collection events, service

⁸ Provincial Consumer Awareness study conducted by CESA and National Consumer Behaviour study conducted by Product Care Association executive summaries available upon request.

partner, municipal and regional government visits, etc. The ambassador role may change or be replaced over time with other means of regional outreach and communication efforts.

- **Advertising**

CESA will make use of media partners to promote the Program throughout the province. Advertising platforms may include, in various combinations:

- Mainstream and community television
- Print (dailies, periodicals, community publications)
- Radio
- Digital
- Out of Home (billboards, CCTV, poster boards, in-venue promotion)
- Social Media
- Sponsorships
- Events (partnering with existing third party events or hosting ElectroRecycle-specific events)
- Tradeshows and conferences

- **Earned Media**

CESA will regularly engage with news outlets and journalists to share Program wins, advise of Program initiatives and developments, and promote Program events and other community activities.

- **Stewardship Agency Collaboration**

CESA will continue to maintain a hotline and email address where the public can direct program enquiries. CESA continues to work with other stewardship agencies to minimize consumer confusion and address common issues through collaboration with other stewardship programs.

7.2 Consumer Awareness

The Program conducted consumer awareness surveys in 2012 and 2014 and will continue to conduct surveys every two years. In October 2016, the Program commissioned its most recent consumer awareness survey which was conducted by a third party survey provider to determine British Columbian's habits and perceptions of small appliance recycling, and their awareness of small appliance recycling programs in BC.

The most recent survey was conducted online using a sample of 1,004 British Columbian residents with a margin of error of +/- 3.1%, 19 times out of 20. The results were statistically weighted according to the most current demographics to ensure a sample representative of the entire adult population of BC. The survey found a 79% awareness of a program that recycles electrically powered small appliances and power tools, representing a 6% increase in consumer awareness from 73% in 2014.

In addition to the consumer awareness level, the survey provides additional information that indicates awareness is higher for certain product categories. Similar information is provided through waste

composition audits. Together, the information provided through these performance measures identify opportunities for targeted campaigns to address lack of awareness for specific product categories. It is important to note that due to the longevity of Program Products the Program does not anticipate an immediate change in awareness and behaviour in a short timeframe. However, the Program will continue to conduct surveys that measure awareness of product categories in addition to the Program's consumer awareness level.

Consumer Education and Awareness Reporting Measures

Stewardship programs typically experience a strong increase in consumer awareness following the Program's launch that plateaus as the Program matures. Under this Program Plan, the Program will maintain a consumer awareness level of 79% and conduct public awareness surveys every two years to confirm adherence to the target, and to support targeted education and outreach. For each year that the awareness study is conducted, a summary of the questions and results will be included in the corresponding annual report. On an annual basis, the Program will report the consumer awareness level and will provide a qualitative report on product categories that may require additional focus to increase awareness.

8. Management of Program Costs

Product Sales

Most product categories have a relatively stable market demand and are considered by consumers as replacement or commodity products. In these cases, when the product (e.g., a blender) reaches end of life, the consumer generally replaces it with a similar product. However, there are a number of products that have a relatively short (3-5 year) lifecycle in which instance the product sees a significant rise in demand in response to consumer interest, followed by a decline and more modest sales. Products, such as power tools that are correlated to economic indicators such as housing starts, exhibit this type of sales pattern.

The Program does not have direct control over its revenue stream as this is dependent on product sales, which in turn is dependent on the state of the economy. The ever-changing state of the province's economic health does make forecasting future sales difficult.

Program Membership and Fees

The Program is funded by membership fees, known as Environmental Handling Fees (EHFs), remitted to CESA by its members based on the quantity of sales of new Program Products sold in British Columbia. The EHF is not a tax or a refundable deposit and at the discretion of the Producer, the EHF may appear at the time of retail sale as a separate charge or integrated as part of the program cost, and is subject to provincial sales tax. As the majority of retailers choose to show the EHF at point of sale, CESA continues to work towards educating consumers by ensuring information on EHFs is accessible (e.g. information on the Program's website).

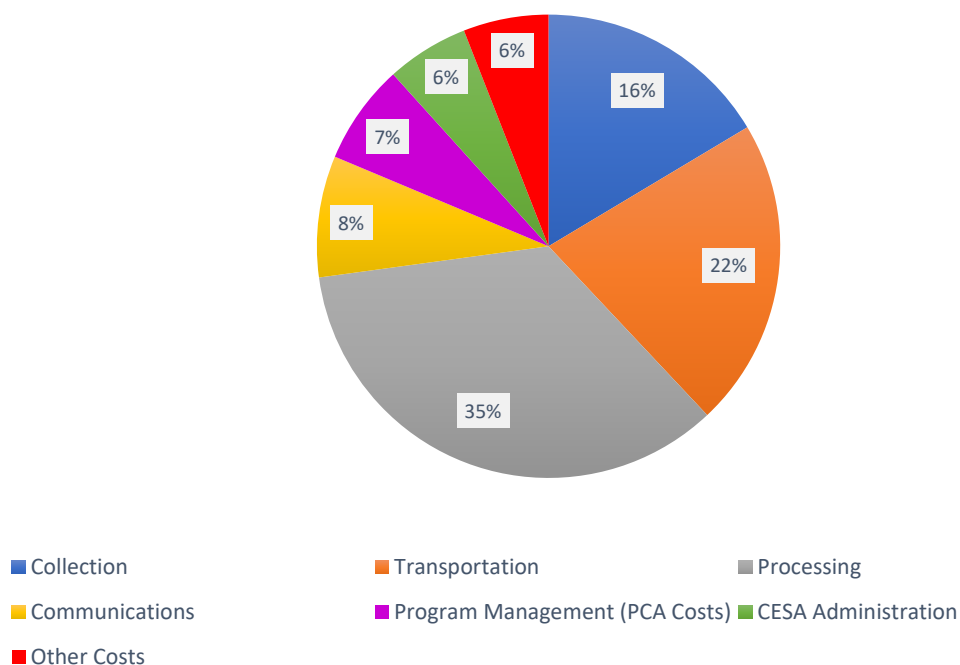
As CESA operates as a not for profit, the EHF's are set by CESA based on budgeting of fee revenue and Program expenses and are adjusted from time to time to maintain the not for profit model. Following the Program's first full year of operation, EHF's of certain product categories were reduced on July 1, 2013. On July 1, 2015, CESA implemented an additional fee reduction for the majority of its product categories. EHF's may continue to be adjusted in the future to address surpluses or deficits, but all fees are used for program purposes.

Program revenues generated by EHF's are applied to the full operation of the Program including:

- Administration;
- Communication and education; and
- Collection, transport, recycling and disposal of collected products.

The chart below identifies the percentage of costs associated with the Program's operation in 2017.

CESA 2017 Program Costs



9

CESA has a fiduciary responsibility in the management of environmental handling fees for the purposes of operating the Program. As indicated in the pie chart above, nearly 75% of program revenue supports the collection, transportation and processing of Program Product. All costs of the Program are carefully monitored to ensure that market trends for compensation, including employee compensation, collection incentives, transportation and haulage rates, and the contracted rates relative to commodity pricing for processors, are reasonable and within the industry norm. Compensation rates for collection

⁹ "Other costs" include additional costs required to support the operation of the Program, including third party contractors, bank and institutional fees and government relations.

facilities, transporters and processors were adjusted in 2017 as part of CESA's regular compensation review.

CESA is committed to ensuring that the Program remains viable and stable and engages in standard practices to ensure all partners are fairly compensated for their part of the recycling story. During consultation, CESA heard from several collection site operators that a compensation increase was warranted, but without substantiating evidence. As of the time of submission of this plan, CESA has not received the requested third-party verified cost analyses from collection facilities to justify a request in a compensation increase. As evidence of the acceptability of CESA's compensation structure, the Program has seen a steady increase in collection facilities joining the Program each year, suggesting CESA's incentives are sufficient to continue to attract new facilities.

CESA trusts that partnerships with the Program meet both the financial needs of its business partners, but in many cases, working with the Program is about more than the financial benefits – it increases foot traffic to collection facilities therefore driving greater revenue potential for other product categories. CESA also has an excellent reputation among its service providers as being responsive to their needs and partnering to provide more opportunities to those seeking to increase their business.

The Program strives to reduce operational costs each year through increased efficiencies while maintaining accessibility and driving higher collection weights. CESA's cooperative partnerships with collection facility operators, transporters and processors help to drive collections, decrease contamination rates (non-Program Product collection), improve reverse-haul logistics, increase economies of scale through innovative partnerships, and drive overall costs per kilogram down year over year.

Risk Management and Reserve Fund

CESA actively reduces the risk arising from product management using a number of methods including:

- Conducting audits on transporter and processor procedures (including operating procedures and control systems) as part of responsible environmental management practices.
- Maintaining adequate insurance to cover liabilities, environmental or other, including directors' and officers' liability insurance.
- Providing the Program's Collection Site Guidelines to all contracted collection facilities. The Guidelines provide practical guidance and best management practices for collection site operators regarding staff handling and storage of Program Products collected.
- Maintaining a reserve fund. The reserve fund was established to stabilize EHF's by addressing year-to-year cost variances resulting from program enhancements and fluctuations in sales and collection weight. The reserve fund also exists to cover the cost of winding up the Association in the event of regulatory change.

Audited Financial Statements

The Program reports out annually on total sales in its annual report to ensure transparency and accountability. The Program's financial statements are audited annually by an independent third party auditor and are published on the Program's website.

9. Management of Environmental Impacts

In response to section 13 of the Regulation, CESA works with its service providers to ensure Program Products are managed, where feasible, in accordance with the Pollution Prevention Hierarchy (PPH). As CESA's focus is managing a product at end-of-life, the following section details the considerations and current management options for Program Products.

Reuse and Repair

While reuse and repair of Program Products are worthy goals, there are several considerations that make it difficult to include it as a viable management option for Program Products. In Canada, there are requirements for mandatory safety testing under programs such as the Canadian Standards Association (CSA) or Underwriters Laboratories of Canada (ULC). Manufacturers are responsible for the safety of all products with safety certification. Outside of licensed and authorized service facilities, manufacturers cannot guarantee the safety of the product after it has reached end of life. Additionally, manufacturers may have warranty restrictions on the sale of used products.

There are also health risks with Program Products that come in contact with the body (e.g., electric shavers) or food (e.g., meat grinders) where sanitation cannot be guaranteed. For these reasons, the Program focuses on the proper recycling and recovery of end-of-life products. The Program Plan recognizes that consumers give properly working appliances to friends and family as well as to charitable organizations. As long as the product is in good working order, such reuse does exist outside the parameters of the Program.

Proper maintenance and repair is encouraged as a means of extending the life of product, however the cost of repair is typically comparable to the cost of replacement. As such, the economic incentive to repair a product and the availability of appliance repair locations is limited. Although options for reuse and repair of appliances may be limited, CESA's will work towards providing consumers with information for alternative options to disposal of Program Products, where feasible. The website will address options for appliances still in working condition such as donation centres, as well as identifying repair opportunities, such as repair cafes.

Recycle/Recover

The Program strives to manage collection materials using the highest option on the PPH as set out under subsections 5(3)(d-g) of the Regulation, where economically feasible and viable. CESA contracts with all processors who handle CESA's collected material. CESA's processors are required to conform to the Electronics Product Stewardship Canada (EPSC) Electronic Recycling Standard (ERS), among other required tracking, inspection and reporting standards as set out of the Program. CESA retains the right to audit processors at any given time to ensure awareness of health, safety and environment concerns are in place, as well as ensuring the management of responsible downstream recycling processes, as per the EPSC Standard, are adhered to.

The EPSC Electronic Recycling Standard defines the minimum requirements for handling end-of-life electronics and contains mandatory environmental, occupational health and safety, and material handling requirements. This Standard was originally developed by EPSC in 2004 and is employed by electronic recycling programs and processors across Canada. Although the Program's processors currently use the EPSC Standard, CESA may choose to adhere to a different recycling standard, such standard to be recognized and accepted nationally or by other provinces. CESA will commit to reporting annually on any changes to the environmental standards to which the Program holds its processors accountable.

As CESA currently accepts more than 350 different products, materials are reported out by commodity only, not by product type or component. The last several years of data show a significant increase of plastics in the composition of materials collected from Program Products. The Program follows the chain of custody through to the end fate of the product; however, the Program's ability to do so is limited by the processors ability to provide such information. CESA provides all available material with regard to end fate in the Program's annual report.

Current recycling and recovery methods for common commodities found in CESA products are detailed in Table 3. CESA will continue to manage collected products and accessories, including batteries, in accordance with the Pollution Prevention Hierarchy whenever feasible and economically viable recognizing that the management process of commodities is subject to change.

Table 3: Examples of Commodity Management Derived from Program Products

Commodity	Downstream Process ¹⁰
Aluminium	Shred and Consolidate
Circuit Boards	Smelt
Copper	Shred and Consolidate Shred and Smelt
Ferrous Steel	Shred and Consolidate, Sorting and Processing
Glass	Crush, Smelt, Washing & Grinding
Non Rechargeable Batteries	Consolidate
Plastics	Sorting, Separation, Grinding, Extrusion and Pelletizing, Shredding and Granulation
Rechargeable Batteries	Consolidate
Wire and Cables	Smelt, Sorting and Processing

¹⁰ Downstream Processes are based on the descriptions provided by the Recycler Qualification Office (RQO) and EPSC Electronic Recycling Standard verified Processors detailing the end disposition of product managed.

10. Dispute Resolution

CESA contracts with all suppliers and service providers to the Program through commercial agreements. CESA also contracts with reputable downstream processors and ensures compliance with vendor standards. A three-step process is employed for any unresolved disputes arising from collection or processing contracts to ensure a timely and coordinated resolution.

- Step one: CESA will address any disputes with services providers directly through face-to-face discussion;
- Step two: Any unresolved disputes will be addressed using negotiation and mediation between parties;
- Step three: If no resolution has been reached at this point, standard commercial legal procedures including arbitration and civil proceedings will be implemented if required.

At the time of the submission of this Program Plan, there has been no need for dispute resolution to be employed.

11. Performance Monitoring and Reporting Commitments

The performance of the Program is measured using a number of indicators including accessibility and consumer awareness as well as participation in regional waste composition audits. Combined, each of these metrics demonstrate the success of the Program.

The Program has developed a robust collection network which has experienced steady growth over the past years and CESA continues to seek opportunities for expansion. With more than 200 collection sites across BC, the infrastructure of the Program provides 99.5% of British Columbians with access to a collection site. This collection system is augmented through collection events hosted by CESA's Ambassador Program, which held 118 collection events in 2017 alone in collaboration with community partners and other stewardship agencies in remote areas of the province.

In addition to the Program's strong accessibility level, consumer awareness is an essential indicator that British Columbians are aware of, and using the Program. The latest consumer awareness survey found that 79% of British Columbians are aware of the Program, which is a six per cent increase from awareness levels in 2014. In addition to the Program's awareness level, the survey provides CESA with additional metrics regarding British Columbian's in-depth understanding of product categories. This level of insight of product categories is augmented through the Program's participation in waste composition audits, which provide reassurance that Program Products are being diverted from landfills. Waste audit results, in addition to awareness surveys, evidence lesser-known product categories which guide future campaigns to increase awareness levels and participation in the Program.

Collectively, the Program's accessibility and awareness metrics, as well as the comprehensive data received through waste composition audits indicate that the Program is achieving its objectives.

Combining these metrics with a number of additional reporting commitments illustrate a strong and stable Program.

A summary of CESA's performance metrics are listed below in Table 4. The reporting metrics set out below align with the third party assurance requirements for financial and non-financial information.

Table 4: CESA Performance Measures

Metric	Performance Measure	Audited Metric
Collection Network		
Number of contracted collection sites	Report annually by collection site type (regular and/or very large items), provide list of sites with locations and identify changes from previous year	Non-financial audit
Number of contracted collection sites by regional district	Report annually	Non-financial audit
Number of collection events by regional district	Report annually	n/a
Absolute Collection		
Total number of very large units collected	Report annually	n/a
Weight (kg) of regular product collected	Report annually	Non-financial audit
Weight (kg) of regular product collected by regional district	Report annually	Non-financial audit
Product collected per capita by regional district (kg)	Report annually	n/a
Waste Composition Audits		
Aggregate of waste audit results conducted over several years	Report annually	n/a
Total amount of aggregate batteries identified in waste audits	Report annually	n/a
Accessibility		

Metric	Performance Measure	Audited Metric
Number of collection sites for regular Program Product	Maintain 99.5% accessibility rate for regular Program Product based on SABC Accessibility Standard	Non-financial audit
Revaluation of accessibility rate	Conduct an accessibility study in or before 2023	n/a
Survey techniques and results	Report each year in which a survey is conducted	n/a
Consumer Awareness		
Consumer awareness survey	Conduct once every two (2) years starting from 2018	n/a
Consumer awareness survey key findings	Report annually	n/a
Percentage of population aware of the program	Maintain 79% awareness	n/a
Program's educational materials and strategies	Report annually	n/a
Qualitative report on product categories with low awareness	Report annually	n/a
Sales		
Total units sold	Report annually	Financial audit
End Fate		
End fate management of materials	Report annually	Non-financial audit
Environmental Standards in place	Report annually	Non-financial audit

Appendix A. Consultation Summary

Sector ¹¹	Question/Feedback	Response Provided
Verbal question asked during consultation proceedings	How has the program plan changed since the beginning of the program?	CESA originally submitted two different stewardship plans in 2011 and 2012. Neither contained program targets, as both represented new program elements. The current draft stewardship plan includes collection, consumer awareness, and accessibility targets based on five years of operational data.
Verbal question asked during consultation proceedings	What changes have occurred since the stewardship plan renewal was first presented in May 2016?	Aside from minor edits to enhance clarity, no substantive changes have been made to the draft stewardship plan since May 2016. Minimal stakeholder feedback was received.
Service Provider	How can a depot reach out to CESA?	Depots are encouraged to reach out to the Program's manager by phone or email with any program-related questions.
Service Provider	Available space can be an issue for depots. Is this a risk for the CESA program and is CESA willing to help the depots expand?	CESA recognizes that space can be a barrier for depots who want to participate in the CESA Program. However, depots are independent, for-profit businesses. CESA provides uniform compensation to all program depots, but does not subsidize individual depot expansion. Where space prohibits a depot from offering a permanent collection site for CESA product, CESA employs alternative strategies to steward CESA products, which include

¹¹ Guidance for Stewardship Plan Consultation proceedings was provided following the completion of CESA's consultation process. As such, CESA has provided as much detail as possible regarding stakeholder (sector) participation.

Sector ¹¹	Question/Feedback	Response Provided
		collection events held in participation with local depots.
Service Provider	Will CESA provide an incentive for individual depots to allow them to develop outreach for their local communities instead of using CESA's over-reaching general education?	CESA does not provide incentives to individual depots to promote their business, however CESA is open to partnering with individual depots to host collection events, in which case, the Program will aid in the local promotion of said event.
Verbal question asked during consultation proceedings	What is the difference in the collection mechanism between regular and very large CESA products?	Regular products are collected in large nylon bags and uniform shaped products (e.g. microwaves) are stacked on pallets provided by the Program to collection sites. The regular products are transported to CESA's contracted processors after collection. In contrast, very large (bulky) items collected through the Program's network are managed as scrap metal by each contracted collection facility and are handled independently of the program.
Verbal question asked during consultation proceedings	Does the program plan to establish targets for the number of collection sites in the province that accept very large items? If not, how does the program ensure there is accessibility throughout BC for very large item collection?	The Program does not intend to create targets for very large item (bulky) collection sites. The Program encourages potential collection sites to consider participating in the bulky collection program when applying to participate in the CESA program. If establishing a permanent collection site for bulky items is not an option for a community, the Program will consider hosting a collection event individually, or consider

Sector ¹¹	Question/Feedback	Response Provided
		the possibility of participating in a collection event with other parties, such as municipalities, regional districts or retailers.
Verbal question asked during consultation proceedings	How are depots compensated for the collection of very large items?	Very large items are managed as scrap metal and collection sites retain any revenue from the sale of very large items as scrap metal. In addition, CESA compensates large item (bulky) collection sites in the amount of \$100 per month for submitting a monthly tracking form.
Verbal question asked during consultation proceedings	How is CESA making efforts to ensure collaboration with other programs to create one-stop-shops for consumers?	When reviewing depot applications, one of the primary criteria in considering a collection site for the Program is whether the site accepts EPRA product. This reduces consumer confusion around accepted products. CESA's collection system has also been developed in collaboration with other stewardship programs to provide consumers with a one-stop-shop for designated products wherever feasible.
Verbal question asked during consultation proceedings	CESA is comparing its awareness levels to other stewardship programs. How can this comparison be made – is CESA asking the same questions as other programs?	CESA uses comparable questions in the consumer awareness surveys as a variety of other Stewardship Programs which allow for cross-comparisons of survey results.
Verbal question asked during consultation proceedings	How much of the CESA product collected is considered to be very large items?	Very large items comprise a very small amount of the total weight of CESA product collected. This is due to the nature of these products. They are expensive, more robust items with longer lifespans that tend to be reused

Sector ¹¹	Question/Feedback	Response Provided
		and resold as opposed to recycled.
Verbal question asked during consultation proceedings	What is CESA's plan if the metal commodity market was to crash and end up costing depots to manage very large items, making them unwilling to continue the collection of these products?	CESA monitors metal pricing and works with its program partners to ensure that the Program is managed in a sustainable manner. Stakeholders appreciate that commodity markets are cyclical and, as businesses, are encouraged to manage fluctuations in market pricing over time as part of their business strategy. This includes benefiting from when metal prices rise and planning for drops in pricing.
Verbal question asked during consultation proceedings	How does CESA address/promote the location of collection sites in individual communities?	The Program employs general promotion of collection sites across the province through a variety of media platforms, which drive consumers to the Program's website to locate a depot or collection event in their area. As for-profit businesses, collection sites are also encouraged to undertake their own promotional activities. General marketing support, including marketing collateral, are made available for depots upon request.
Verbal question asked during consultation proceedings	Does CESA participate in waste audits and will this information be reported out in the annual report?	CESA participates in waste audits, however the information is not provided in the annual report. Waste audits are carried out in a select number of communities each year in partnership SABC and with regional governments according to their schedule. While the data obtained from

Sector ¹¹	Question/Feedback	Response Provided
		waste audits provides one means of evaluating the success of the program in that community, extrapolating the results to the entire province is problematic.
Local Government	Light weighting of products is becoming an issue. Has CESA considered converting its collection reporting from weights to units?	CESA's service providers do not conduct counts of individual product units, but rather weigh each bag and pallet of product collected. Given the weight of product collected, counting each product received would be cost prohibitive to the Program.
Steward	When appliances and power tools are brought to Salvation Army locations, do they reuse/resell the products or recycle them?	The decision of whether to resell or recycle a product is made by the individual Salvation Army location.
Steward	Does CESA have plans to communicate to retailers on the new recycling targets to encourage consumers to recycle?	CESA continues to work with retailers across the province to promote recycling and the CESA program. Point of sale and point of return materials promoting recycling and the Program are provided to retailers for free on request. The Program also partners on retailer-hosted collection events.
Verbal question asked during consultation proceedings	Regarding the performance measure table in section 7 of the plan, why is there no accessibility target provided?	An accessibility study conducted in 2015 determined the Program's collection network had an accessibility level of 99.5% based on the SABC accessibility standard. Accordingly, CESA does not see the need to set further targets. The Program will continue to monitor the collection network and strive to maintain this level through the next mandate.

Sector ¹¹	Question/Feedback	Response Provided
Verbal question asked during consultation proceedings	What is the Ministry of Environment's timeline for approval of the stewardship plan? When will CESA be held accountable for the collection targets if the plan is not approved for those years?	There is no expiry date of either of the existing approved plans. CESA will continue to operate under the existing approved stewardship plans a new plan is approved. That said, although the Program may continue to operate under the existing plans, CESA will strive to meet the goals as stated in the proposed stewardship plan, and such efforts and resources will be applied in 2017/2018 and forward to meet those stated targets. However, for the purposes of third party verification auditing, CESA would not be held accountable to the targets in the proposed plan, until it is approved.
Verbal question asked during consultation proceedings	What are the consequences if CESA does not meet the targets provided in the stewardship plan renewal?	Please contact the Ministry of Environment directly for information on compliance and enforcement.
Vancouver Island Recycling and Waste Industry Coalition (VIRWIC)	The CESA Stewardship Program is required by the Recycling Regulation to pay the cost of collecting its products. Our members that participate in the CESA program have identified that the full costs for CESA product collection are not being paid by CESA but instead being subsidized by other programs, mainly the Encorp beverage container program. VIRWIC requests that the CESA Stewardship Plan clearly identify how it will ensure that it is paying the cost of collection of its products. The CESA	Section 5(1)(c)(i) of the BC Recycling Regulation provides that the program plan "adequately provides for (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan..." CESA contracts with collection sites and pays a flat rate per metric tonne of product collected. The Program is not aware of evidence demonstrating cross-program subsidization of

Sector ¹¹	Question/Feedback	Response Provided
	Stewardship Plan could be amended to include a commitment to work with collection facilities to identify a full cost formula that would ensure the Recycling Regulation requirement is met.	the cost of collecting CESA product.
Metro Vancouver	With reference to page 6 of the proposed plan: “The ever-changing state of the province’s economic health does make forecasting future sales difficult.” Recognizing that this is a challenge, but not sure why 'stakeholders' of this Stewardship Plan would have an interest in this statement. Do you mean that fees to brand owners will be fluctuating? Needs further clarity.	This statement is in the proposed plan is to reflect that due to the difficult nature of forecasting sales, it also creates challenges when predicting the amount of available product for collection, which in turn poses challenges for the Program when creating collection targets and budgeting for operational costs (collection and processing).
Metro Vancouver	With reference to page 9 of the proposed plan: Recognizing the impacts associated with a maturing program and lightweight product development trends, the program is encouraged to be more ambitious in targeting year-over-year increases in overall collection amounts.	The Program’s absolute collection targets may appear to be conservative as the Program does not anticipate that the rate of increase in collections will be sustained through the next term. The material composition of small appliances continues to move towards use of lighter weight commodities so an increase of product collected may not result in similar increases in collected weights, and accessibility and consumer awareness levels are currently very high. Any future growth will be relatively modest compared with the early rapid expansion of the Program’s collection network and similar rapid increase in consumer awareness.

Sector ¹¹	Question/Feedback	Response Provided
Metro Vancouver	With reference to page 9 of the proposed plan: Consider utilizing waste characterization studies conducted by local governments as an additional performance measure. For example, in the 2015 Metro Vancouver Waste Composition Study, small appliances and floor care items make up 1/2 of the e-waste category. The estimated amount of small appliances and floor care items discarded in the region is approximately 3 kg/capita.	Please refer to the above comment regarding waste audits.
Metro Vancouver	With reference to page 12 of the proposed plan: Aside from item a), the remaining “objectives” under the “Communication Education and Awareness” section of the program plan read more like actions. Suggest revising this list to create “objectives”.	This section of the plan has been revised to ensure the Program’s objectives are clear.
Metro Vancouver	With reference to page 12 of the proposed plan: Ensure CESA speaks to its various audiences in the manner that will best engage them.” It's not clear how this relates to the province’s geography.	The Program employs a variety of marketing techniques throughout the province. Different regions in BC may respond more positively to specific communication platforms, therefore an objective of the Program is to ensure that appropriate methods of communication and education are used based on the region of the province that is being targeted.

Additional comments were received addressing EPR Programs as a whole. The responses provided are from CESA's perspective and do not necessarily represent the view of other EPR Programs.

Sector	Question/Feedback	Response Provided
Metro Vancouver	Compensate collectors. Although some of the programs have achieved stellar recovery rates, many collectors are not compensated for their activities. As a result, recovery of obligated material is likely lower, and there are early indications of some collectors transferring materials to other collectors because there is no meaningful benefit for the collector to 'go the extra mile'.	With respect to CESA, the Program has ensured that all collection sites in its collection network enter into a contractual agreement that provides compensation for collecting program materials.
Metro Vancouver	Data Collection. Formalize the collection of data, including options that exist outside of the official EPR collection network. If 'competing' collectors do not have an incentive to report data, paying for data or providing an incentive to report should be considered 'in-scope' for program obligations.	With respect to CESA, the Program receives detailed reporting from its processors and collection sites on the weight of program products collected.
Metro Vancouver	Options for Local Government. All EPR programs should develop an arrangement for local governments who receive, or pick-up illegally dumped material, to be paid for managing and handling this material, whether or not the facility is designated as a depot. Local governments, generally, do not seek to compete with private depot operators, yet still receive this materials from residents and businesses. (A recommended project for the Stewardship Agencies of BC would be to find out the root causes for people who dump illegally, who bring materials to transfer stations even when there are permanent depots available, prefer 'round-up' events to permanent depot locations, and	As per the Regulations, stewardship programs are responsible for providing a free, accessible option for the responsible management of products at end-of-life and to promote this option to consumers. If consumers elect to disregard the system provided, this is not the responsibility of the stewardship programs. CESA continues to work with local governments and retailers to support efforts to curb illegal dumping, within the Program's mandate.

Sector	Question/Feedback	Response Provided
	'hide' banned materials in residential loads. Such a study is recommended to include possible solutions to address these issues, such as enhanced collection models that go beyond the drop-off approach (depot model), and financial incentives to encourage product and packaging recovery directly through the EPR programs' collection infrastructure.)	

Following the submission dates of the Program Plan in September 2016 and December 2017, the Program has continued to put itself in a position to receive in-person feedback from a variety of stakeholders. Although not a formal consultation, CESA attended the RCBC and CWMA conferences and participated in a series of round table discussions with service providers, including collection facilities and regional districts. The feedback received was primarily positive and during these interactions there was no mention of concern surrounding compensation rates. Questions directed at the Program are summarized in the table below.

Sector	Question/Feedback	Response Provided
Service Provider	Bag shortages (CESA mega bags) is a concern for higher volume depots in busier months, will the transporters supply depots with additional bags upon request?	CESA recognizes that certain months tend to experience higher volume, particularly in areas with larger populations. Effort will be made to ensure additional bags will be provided to depots who experience higher volumes of collection in advance.
Service Provider	What is required to have CESA host a round up event in one of our communities?	CESA's Ambassador Program is always searching for opportunities to host a collection event. Once a "champion" is identified in a community, be that a depot, and municipality or an organization who is willing to act as the host and location of the event, the Ambassador Program will make the arrangements to educate volunteers, promote the event and ensure transportation and processing of collected material

Sector	Question/Feedback	Response Provided
		is provided. Please contact CESA either through phone or email and we will make every effort to ensure a successful collection event in your community.
Service Provider	Additional education is needed to help depots determine the difference between CESA and EPRA products.	CESA has educational material including a depot guidebook and detailed product list to educate consumers and service providers on the variety of products accepted through the Program. If there is ever uncertainty on whether the product belongs in CESA's bag or not, please contact CESA for further clarity.

Appendix B: Submission Checklist for Product Stewardship Plans under the Recycling Regulation

General
Stewardship plan title: CESA BC Extended Producer Responsibility Plan
Product category: Small Appliances and Power Tools
Stewardship plan submission date: September 30, 2016 / Resubmission date: December 8, 2017 / Resubmission date: June 22, 2018
Date of originally approved stewardship plan and subsequent plans and/or amendments: Part 1: Phase 4 Products – August 17, 2011 Part 2: Phase 5 Products – March 9, 2012
Submitted by: Jenn Robson
Primary contact (name, phone, and email): Jenn Robson 778 331-6940 jenn@productcare.org
Stewardship program website: http://www.electrorecycle.ca/

Information included in the stewardship plan	Y/N/NA	Explanation if N or N/A
In deciding whether to approve the stewardship plan, the director may consider Section 5(2)(a) through (m). In developing the stewardship plan and program operations consideration was given to the following:		
1. The population and geographical area of the markets in which the producer sells, offers for sale, distributes or uses in a commercial enterprise the product	Y	Section 2; Section 3
2. The manner in which the product is marketed and retailed by the producer	Y	Section 2
3. The nature of the product	Y	Section 4
4. The amount of product the producer expects to sell, distribute or use in a commercial enterprise each year	N	Given the nature of Program Products and fluctuating state of economy, forecasting sales is challenging and unreliable at this time. See Section 8 for additional information.

Information included in the stewardship plan	Y/N/NA	Explanation if N or N/A
5. The amount of product the producer expects to collect each year	N	See Section 6.3 for additional explanation.
6. The size of the population intended to be served by each collection facility	N	Population size varies by location. The Plan references the percentage of BC's population that has access to a permanent collection site for regular products. See Section 6.2 for additional information.
7. The provision of convenient options for the collection of products in urban centres and small, isolated communities, and for persons with disabilities or who have no access to transportation	Y	Section 6
8. The methods of product collection, storage, transportation and management	Y	Section 6; Section 9
9. The structure of financial and operational co-operation with other producers	Y	Section 8

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
Cover page	Y	
Table of contents	Y	Page iii
Glossary of terms and abbreviations	Y	Page ii
1. Introduction		
a) Provides the regulatory context for stewardship plans in BC <i>For example: "In British Columbia the Recycling Regulation under the Environmental Management Act sets out the requirements for extended producer responsibility, including the requirement for product stewardship plans."</i>	Y	Section 1
2. Duty of producer - Section 2(1)		

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<p>a) Provides the regulatory context for why a producer must have an approved stewardship plan</p> <p><i>For reference, Section 2(1) of the Regulation provides: A producer must (a) have an approved plan under Part 2 [Product Stewardship Plans] and comply with the approved plan with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia</i></p>	Y	Section 2
b) If the producer is submitting an independent stewardship plan, the stewardship program information is easy for the public to locate on the program website and the webpage link is provided in the stewardship plan	N/A	
3. Appointment of stewardship agency (if applicable) - Section 2(2),(3),(4),(5)		
a) Provides the following statements:		
<ul style="list-style-type: none"> Before the agency begins to carry out the duties of the producer under Part 2 of the Recycling Regulation the producer must notify the agency in writing of the appointment, specifying the duties under Part 2 the agency will perform on behalf of the producer – Section 2(2) 	Y	Section 3
<ul style="list-style-type: none"> A copy of any notification the agency received from the producer is available upon the request of a director – Section 2(4)(b) 	Y	Section 3
<ul style="list-style-type: none"> The stewardship plan confirms the duties that the agency will perform on behalf of each producer that has joined the agency; or alternatively, state how written confirmation will be provided to a director under the Regulation – Section 2(3)(a) 	Y	Section 3
b) Lists of the producers the agency currently represents in an appendix and/or provide the regularly updated membership webpage link – Section 2(4)(a)	Y	Section 3
c) Describes the producer membership	Y	Section 3
d) Identifies the approximate collective market share that the member producers represent in BC for the products covered under the stewardship plan	Y	Section 3
e) Stewardship program information is easy for the public to locate on the agency website and the webpage link is provided in the stewardship plan	Y	Section 3
Agency governance		
f) Describes the agency's structure and governance that demonstrates transparency and oversight, such as:		
<ul style="list-style-type: none"> Operating as a not for profit corporation, under the Canada Not-for-Profit Corporations Act, and/or BC Societies Act 	Y	Section 3
<ul style="list-style-type: none"> Current board of directors (name and affiliation) accountable to the producer membership 	Y	Section 3

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<ul style="list-style-type: none"> Webpage link to the program's Federal Corporation Information 	Y	Section 3
<ul style="list-style-type: none"> The process or webpage link for stakeholders to obtain current bylaws and financials 	Y	Section 3
<ul style="list-style-type: none"> Current or anticipated advisory committees, associations, etc. 	Y	Section 3
Performance monitoring and reporting commitments		
g) Provides the reporting commitments:		
<ul style="list-style-type: none"> Any changes in the agency's structure and governance from the previous annual report 	Y	Section 3
<ul style="list-style-type: none"> List of board members and affiliation 	Y	Section 3
4. Products covered under the stewardship plan - Section 4 and relevant schedule		
a) Lists the applicable regulatory schedule and product categories	Y	Section 4
b) Lists the included (and excluded if relevant) products and/or program defined product categories and the regularly updated webpage link for all products covered	Y	Section 4
c) Identifies other stewardship program(s) for the same products operating under a separate stewardship plan – Section 5(2)(l)	N	To our knowledge there are no other stewardship programs operating for this scope of product.
5. Stakeholder consultation - Section 5(1)(b)		
Consultation undertaken prior to stewardship plan submission		
a) The producer(s) have undertaken satisfactory consultation with stakeholders prior to submitting the stewardship plan for approval, including:		
<ul style="list-style-type: none"> Identifying the stakeholders whose interests will potentially be or are affected by the provisions of the proposed stewardship plan and program operations 	Y	<p>Section 5</p> <p>Guidance for Stewardship Plan Consultation proceedings were provided following the completion of CESA's consultation process. As such, CESA has provided as much detail as possible.</p>
<ul style="list-style-type: none"> The consultation process engaged a cross-section of identified stakeholders 	Y	Section 5
<ul style="list-style-type: none"> The stewardship plan and consultation materials clearly provided sufficient detail to enable those affected by the plan and program operations to determine the implications to their 	Y	Entire Stewardship Plan

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
interests, including, if applicable, a summary of the program's potential impacts, both positive and negative, to affected stakeholders		
<ul style="list-style-type: none"> Provides the proceedings of the consultation process including: <ul style="list-style-type: none"> The effective and timely notice of consultation opportunities (distribution lists, advertisements, etc.) The amount of time given to respond to the draft stewardship plan When and where the meetings and/or webinars were hosted The parties consulted and attendance at meetings or webinars, including who they were and/or their affiliation Documents and materials presented Webpage link to all publically available consultation materials 	Y	Section 5; Appendix A
<ul style="list-style-type: none"> Describes the transparent process for reviewing submissions and responding to stakeholders on how their responses were addressed 	Y	Section 5; Appendix A
<ul style="list-style-type: none"> Details the stakeholder responses, the options considered for the stewardship plan or program operations, and the rationale for why each option is or is not being pursued 	Y	Appendix A
Ongoing stakeholder engagement		
b) Describes the opportunity for stakeholder input in the implementation and operation of the stewardship program	Y	Section 5
6. Collection system and consumer accessibility – Sections 5 and 8		
a) Provides the following commitments:		
<ul style="list-style-type: none"> The producer collecting and paying the costs of collecting and managing products within the product category covered by the stewardship plan, whether the products are currently or previously sold, offered for sale or distributed in BC – Section 5(1)(c)(i) 	Y	Section 8
<ul style="list-style-type: none"> Reasonable and free consumer access to collection facilities – Section 5(1)(c)(iii) 	Y	Section 6
<ul style="list-style-type: none"> With respect to the solvent and flammable liquids, pesticide, gasoline and pharmaceutical product categories a commitment to – Section 5(1)(c)(ii): <ul style="list-style-type: none"> the collection of residuals and containers that are or were in direct contact with a residual, and the management of residuals and containers collected 	N/A	These products are not stewarded under this Program.
Collection system		
b) Describes the product collection system and program operations, including:		

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<ul style="list-style-type: none"> The different types of collection channels (e.g., depot, return-to-retail, private or commercial, mobile, events, mail-back, etc.) given the nature of the product (e.g., small, large, hazardous, etc.) 	Y	Section 6
<ul style="list-style-type: none"> The process to identify the varying collection performance for the sub-categories of products covered under the stewardship plan 	N	Due to the extensive number of Program Products and product categories, it is not feasible for the Program to track this information. See Section 6.3/6.4 for additional information.
<ul style="list-style-type: none"> The principles for collection accessibility (e.g., province wide, small isolated communities, rural/urban areas, by regional district, etc.) 	Y	Section 6.2
<ul style="list-style-type: none"> The process to identify areas that are underserved and/or have lower than average collection 	Y	Section 6.2
<ul style="list-style-type: none"> Efficiency and consistency opportunities being pursued with other stewardship programs 	Y	Section 6.2
Product pathways that are not directly managed by the stewardship program		
c) Describes the end-of-life and/or the export pathways for all of the products covered under the stewardship plan that are not directly managed by the stewardship program, including: <ul style="list-style-type: none"> Private handling of industrial, commercial and institutional products Disposal at landfill Incidental municipal and/or other stewardship program collection Market-based commodity system 	Y	Section 6.1
<ul style="list-style-type: none"> Describes the process for tracking the unmanaged product pathways, such as: <ul style="list-style-type: none"> Unaccounted for product study Behavioural survey Waste composition study Industry associations and representatives 	Y	Section 6.5
Performance monitoring and reporting commitments		
d) Provides performance metric(s) and targets(s) for the following:		
<ul style="list-style-type: none"> A recovery rate, or An alternative performance metric - Section 5(1)(a) 	Y	Section 6.4; Section 6.3

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<ul style="list-style-type: none"> ○ If an alternative metric to a recovery rate is used, rational is provided in the stewardship plan 		
<ul style="list-style-type: none"> • Collection accessibility <ul style="list-style-type: none"> ○ Facilities province-wide ○ Facilities for each regional district ○ Rural/urban regions ○ Different types of products 	Y	Section 6.2
e) Provides the reporting commitments:		
<ul style="list-style-type: none"> • The total amount of the producer's product sold - Section 8(2)(e) 	Y	Section 11
<ul style="list-style-type: none"> • The total amount of the producer's product collected - Section 8(2)(e) 	Y	Section 11
<ul style="list-style-type: none"> • The total amount of the product recovered in each regional district - Section 8(2)(e.1) 	Y	Section 11
<ul style="list-style-type: none"> • The total amount of the product recovered per capita for each regional district and for the province 	N	Due to the nature of Program Products, there is no value of a per capita analysis by regional district for the Program.
<ul style="list-style-type: none"> • The varying collection performance for the sub-categories of products covered under the stewardship plan and the actions that will be taken to increase the collection of these products 	N	Due to the extensive number of Program Products and product categories, it is not feasible for the Program to track such information. See Sections 6.3/6.4/6.5 for additional information.
<ul style="list-style-type: none"> • The location of collection facilities, and any changes in the number and location of collection facilities from the previous report - Section 8(2)(b) 	Y	Section 6.1; Section 11
<ul style="list-style-type: none"> • Identified under-served areas or regions with lower than average collection and the actions that will be taken to address collection in underserved areas (e.g., funded collection and awareness events, etc.) 	Y	Section 6.2
<ul style="list-style-type: none"> • Information from local government waste composition analysis identifying the kilos per capita for program materials 	Y	Section 6.5
f) The reporting metrics align with the requirements of third party assurance for non-financial information – Section 8(2)(h), including: <ul style="list-style-type: none"> • Stewardship program specific definitions, and 	Y	Section 11

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<ul style="list-style-type: none"> Stewardship program applicable criteria 		
7. Consumer awareness		
a) Describes the kind (e.g., target the right audience at the right time in the right place) and amount of advertising and consumer education planned to inform consumers of the location and operation of collection facilities and the environmental and economic benefits of participating in the stewardship program – Section 5(2)(j) and Section 5(1)(c)(iv) including:	Y	Section 7
<ul style="list-style-type: none"> Program specific and collaborative communications tools (e.g., websites, province-wide hotline, municipal calendars, etc.) 	Y	Section 7
<ul style="list-style-type: none"> Participation with other stewardship programs in awareness and education initiatives (e.g., advertising, shared events, ambassador program, etc.) 	Y	Section 7
b) Describes the strategies and actions to make retailers adequately aware of the stewardship program, including information to correctly answer consumer questions regarding visible fees, the safe handling of products, and collection channels	Y	Section 7
Performance monitoring and reporting commitments		
c) Provides a consumer awareness metric(s) and target(s)	Y	Section 7.2
d) Provides the reporting commitment: A description of the program's educational materials and strategies – Section 8(2)(a)	Y	Section 7.2; Section 11
8. Management of program costs - Section 5(1)(c)(v)		
a) Describes the stewardship program's funding model and oversight, including:	Y	Section 8
<ul style="list-style-type: none"> Transparency and accountability principles and/or practices for the management of fees collected 	Y	Section 8
<ul style="list-style-type: none"> Financial risk management principles and/or practices, for example: <ul style="list-style-type: none"> Maintaining a reserve fund How the balance is justified Methods to maintain the fund overtime 	Y	Section 8
Performance monitoring and reporting commitments		
b) Provides performance monitoring metrics and targets	Y	Section 11
c) Provides the reporting commitment to independently audited financial statements detailing – Section 8(2)(f): <ul style="list-style-type: none"> All deposits received and refunds paid, and/or Revenues and expenditures for any fees associated with the approved stewardship plan that are charged separately and identified on the consumer receipt of sale 	Y	Section 8
9. Management of environmental impacts - Section 5(1)(c)(v)		
a) Provides for the management of the product throughout the product's life cycle and in adherence to the order of preference in	Y	

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
<p>the pollution prevention hierarchy – Section 5(1)(c)(v) and Section 5(2)(c)(viii), including:</p> <ul style="list-style-type: none"> Options and strategies for each level of the hierarchy Factors that impact the decision-making process <ul style="list-style-type: none"> Level of direct influence or ability to impact Technical and economic feasibility Environmental and safety impacts Research and development Opportunities to expand materials collected and/or processed Influence expansion of processing capabilities in the future Identified acceptable product and/or material end fates The various product and/or material processing pathways relative to their final disposition Program environmental and safety risk management practices and due diligence processes for the collection and processing of products and/or materials to end disposition (e.g., certifications, standards, processor inspections, third-party audits, downstream tracking systems, legislation, etc.) 		<p>Section 9</p> <p>Please note that the Program's focus is managing a product at end-of-life, therefore CESA has no influence over industry or the product design and manufacturing processes.</p>
Performance monitoring and reporting commitments		
b) Provides acceptable product and/or material end fate metrics and targets (If applicable)	Y	Section 9
c) Provides the reporting commitments:		
<ul style="list-style-type: none"> Efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle - Section 8(2)(c) 	Y	Section 9
<ul style="list-style-type: none"> A description of how the recovered product was managed in accordance with the pollution prevention hierarchy - Section 8(2)(d) including: 	Y	Section 9
<ul style="list-style-type: none"> Conformance with acceptable product and/or material end disposition 	Y	Section 9
<ul style="list-style-type: none"> Program environmental and safety risk management practices and due diligence processes for the collection and processing of product(s) and/or material(s) to end disposition 	Y	Section 9
<ul style="list-style-type: none"> Degree of certainty over the processing pathways to support quantitative information on product and/or material end disposition 	Y	Section 9
<p>d) The reporting metrics align with the requirements of third party assurance for non-financial information – Section 8(2)(h), including:</p> <ul style="list-style-type: none"> Stewardship program specific definitions, and Stewardship program applicable criteria 	Y	Section 11

Information included in the stewardship plan	Y/N/NA	Reference Page # and/or Explanation
10. Dispute resolution - Section 5(1)(c)(vi)		
a) Provides a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the stewardship plan or operation of the product stewardship program	Y	Section 10
11. Performance monitoring and reporting commitments – Section 5(1)(c)(v)		
a) Summarizes in a table the performance monitoring and reporting commitments over the five-year period of the plan, and beyond (if no amendments are required or are delayed) that are detailed under each of the relevant section headings. Do not include performance metrics and targets in the table that are not addressed under the appropriate section headings	Y	Section 11
b) Identifies performance monitoring and reporting commitments that are subject to third party assurance for non-financial information – Section 8(2)(h)	Y	Section 11